

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

**KELLI DENISE GOODE, Individually,  
and also as the Personal Representative of  
Troy Charlton Goode, Deceased, and as  
Mother, Natural Guardian, and Next  
Friend of R.G., a Minor, and also  
on behalf of all similarly situated persons**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 3:17CV60-DMB-RP**

**THE CITY OF SOUTHAVEN, et al.**

**DEFENDANTS**

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**SOUTHAVEN DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF'S  
MOTION IN LIMINE PRECLUDING DEFENDANTS FROM OFFERING OR  
INTRODUCING EVIDENCE OF ANY INVESTIGATIONS BY THE FEDERAL  
BUREAU OF INVESTIGATION (FBI), MISSISSIPPI BUREAU OF INVESTIGATION  
(MBI), THE DEPARTMENT OF JUSTICE (DOJ) AND/OR THE OFFICE OF THE  
ATTORNEY GENERAL [511]**

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COME NOW Defendants City of Southaven, Todd Baggett, Jeremy Bond, Tyler Price, Joel Rich, Jason Scallorn, Stacie J. Graham a/k/a Witte, Mike Mueller, William Painter, Jr., Bruce K. Sebring, Joseph Spence, and Richard A. Weatherford (collectively the "Southaven Defendants"), by and through counsel, and submits this response to Plaintiff's Motion in Limine to preclude Defendants from offering evidence of any investigations of the Federal Bureau of Investigation (FBI), Mississippi Bureau of Investigation (MBI), the Department of Justice (DOJ) and/or the Office of the Attorney General [511]. For the reasons set forth in Southaven Defendants Response Brief in support of this Response, the motion should be denied.

In support of this Response, Southaven Defendants rely on the supporting Memorandum and on the following exhibits attached:

Exhibit "A" - Excerpts from the deposition of Tom Long, pages 8-11.

Respectfully submitted, this the 13th day of June, 2018.

CITY OF SOUTHAVEN, TODD BAGGETT,  
JEREMY BOND, TYLER PRICE, JOEL RICH,  
JASON SCALLORN, STACIE J. GRAHAM,  
MIKE MUELLER, WILLIAM PAINTER, JR.,  
BRUCE K. SEBRING, JOSEPH SPENCE, and  
RICHARD A. WEATHERFORD, Defendants

By: /s/ Berkley N. Huskison  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system and forwarded such filing via ECF notification to the following:

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This the 13th day of June, 2018.

/s/Berkley N. Huskison